

EMERGENCY HAZARDOUS WASTE MANAGEMENT PLAN

TRI-Rinse, Inc.

I. Hazardous Waste Personnel: Emergency Response Crew

The following list of TRI-Rinse, Inc., personnel are responsible for coordinating any site emergencies and were selected due to their in-depth knowledge and understanding of operational procedures. These individuals will be on the premises or on call at all times and are qualified to act as emergency coordinators.

1. Timothy P. Shocklee, President
2. Sam Seward, Operations Manager

II. Hazardous Waste Training

Following is a list of training given to each of our employees involved with handling hazardous waste.

A. Initial Training

1. Right to Know Training

A plan to help our employees and our community to become more knowledgeable of chemical accidents by providing them with information on the chemicals stored, used, disposed of and discharged by TRI-Rinse.

2. TRI-Rinse Drug Policy

- A. The use of, possession, concealment, transportation, promotion or sale by company employees and other invitees of the following items or substances are strictly prohibited anywhere or anytime on company or customer premises.
- B. Every employee is subject to random drug screening per Human Resources scheduling. The employee will provide written consent to the testing and be notified that TRI-Rinse is a member of the EAP Program (Employee Assistance Program), in time of need.

3. Associated Safety Training

- A. To ensure the safety of TRI-Rinse employees, we provide them with proper procedures on the use and care of their company issued respirators. In the course of our business it is sometimes necessary to work in areas where we

must utilize respirators. Each employee is respirator fit tested annually by TRI-Rinse's Safety Director.

- B. Regular safety meetings are given to review safety procedures, new equipment, operation instructions and general company policies.
- C. Hazardous Waste 40 Hour OSHA training, including CPR and First Aid, is given to our employees whose job requires extended safety training.
- D. Eight hour updates on Hazardous Waste 40 Hour OSHA training are given yearly to employees whose jobs require updated training.

III. Preparedness and Prevention

We have fire extinguishers, spill absorbants, overpack drums, generators, air compressors, small tools, trucks, forklifts, trailers, and a skid steer loader. In the course of our daily operations, we handle hazardous materials and maintain an inventory of PPE for use when required.

It is a Company policy that we never have a single person working, they always use the "buddy" system.

B. Arrangements with Local authorities:

- 1. We have contacted the City of St. Louis, District 2, Police Dept., and Fire Dept. and given them tours of our facility.
- 2. Our Company is engaged in remedial action projects and clean-ups. Therefore, we can adequately handle any emergency response at the project site. If additional equipment is needed we will have the ability to get equipment from a local vendor.

SITE PROCEDURES FOR ABANDON DRUMS

If a container is found on site:

- A. Shutdown any operations within a 100 yards of the Container.
- B. All Site personnel will clear the area.
- C. Notify Acting Site Superintendent who will notify IDEM.
- D. A 50-foot radius surrounding the container will be barricaded to keep unauthorized personnel out of the area.

- E. Personnel in Level C protection will enter the area and make a visual inspection for:
- 1) The condition of the container and is there an evidence of other containers in the area.
 - 2) Has it leaked or is it Leaking (if it is leaking we will attempt to stop and contain the release)
 - 3) Any information that may determine its contents.
- F. Once this evaluation is made the container will be overpacked and a sample will be taken for analysis. The overpack and sample will be given an ID#.